

REMARKS

The office action and the references cited therein have been carefully considered and amendments have been made to the claims to emphasize pre-existing differences between the prior art cited and applied and to more clearly describe the invention as claimed.

The examiner has maintained the rejection of claims 1-6, 8-12, 14-17, 19-20 and 24-25 under 35 U.S.C. 102(e) as being anticipated by Li et al. (hereinafter "Li").

Applicant has further amended the independent claims 1, 9, 24 and 25 to more accurately define the subject matter of these claims and now believes that these amended claims are neither anticipated, taught nor suggested by Li, applied singularly or in combination with any of the other patents of record.

The manner in which the Li configuration system works is clearly stated in the patent. The abstract indicates that an unconfigured internet access device is shipped directly to a customer without having to be manually configured. The customer enters a registration identification number and a telephone number into the internet access device. The internet access device then automatically connects to the internet, downloads configuration data from a configuration server containing customer site specific configuration data and then automatically configures itself for communication with the internet.

This is also consistent with language identified by the examiner at column 12, lines 43-48: "Once connected to an ISP, the internet access device is then able to automatically locate a configuration server, request the unique configuration record for that internet access device, download that configuration record and then automatically configure itself for communication with the internet using the configuration record." The examiner also specifically identified a portion of Li's claim 1 which states "downloading said configuration record from said configuration server to said access device". The summary of the invention contains similar and consistent descriptions of the operation.

An important aspect of Li is the fact that there is a configuration server from which configuration data is downloaded to a device. It is a single server that provides such configuration data. This is different from what is claimed in claim 1 for example, which states that there is a first device which comprises a server, hub, router, client or switch and which is unconfigured and connected to the network and a second device that comprises a server, hub, router, client or switch and which is configured and connected to the network, wherein the second device sends over the network at least a portion of its configuration information, wherein a portion of said configuration information of said second device is used by said first device to create its own configuration information, including its own unique identification address.

At column 14, lines 50-62, the configuration step is described in more detail. It is stated that "Fig. 12 describes more detail the configuration step 726 of Fig. 11b. Before Fig. 12 is described in detail, the types of information that may be present in the configuration record are first described. The Internet access device is able to automatically configure itself for communication with the Internet using information contained in the configuration record." It is established that the configuration record is contained in the configuration server 410 shown in Fig. 8 which is a part of the Internet service provider.

Continuing on with the text of column 14, "the configuration record contains information such as the customer domain name, the customer LAN network IP address, *the Internet access device IP address*, the DHCP range, . . ." While the examiner attempts to equate Li with the invention claimed in claim 1, the operations are markedly different. In Li, configuration data includes the IP addresses or a unique range of addresses (Column 11, line 43-44). Also, the text at column 12, lines 43-48 describes the configuration operation: "once connected to an IST, the Internet access device is then able to automatically locate a configuration server, request the unique configuration record for that Internet access device, download that configuration record and then automatically configure itself for communication with the Internet using the configuration record." Again, the configuration server provides all of the configuration information in Li.

Li does not anticipate, teach or suggest a second device which can comprise a server or a hub or a router or a client or switch, any one of which is configured and connected to the network wherein the second device sends the network at least a portion of its configuration information and wherein a portion of the configuration information of the second device is used by the first device to create its own configuration information, including its own unique identification address.

Li simply does not operate in the manner as claimed. In Li, the configuration information always comes from the configuration server and the configuration record is downloaded to the device. Li does not teach or suggest devices such as hubs, routers, clients, or switches, which can be devices other than a configuration server sending a portion (or more) of its configuration information, the portion being used by an unconfigured device to create its own configuration information including the creation of a unique IP address. None of the other references of record do so either, either singularly or in combination with Li. The argument that has been made with regard to claim 1 equally applies to the other independent claims 9, 24 and 25. It is therefore believed that these independent claims are in condition for allowance.

The differences between the prior art and the present invention are important. As stated in the summary of the invention at page 4, the present invention can have servers, hubs, routers, switches as well as other client computers send a portion of configuration information which minimizes the interaction by the user or system administrator and also the need for specialized software service for the configuration server. In the present invention, any one of many types of configured devices sends back information to the unconfigured device about the network environment. The unconfigured device uses this information about the network environment to create its own unique IP address.

The dependent claims 2, 3, 4, 8, 12, 15, 19, 21, 22 and 23 have been amended to correct grammatical errors and/or improve the style and understanding of these claims. Claims 5, 6, 7 and 20 have been cancelled. Because the dependent claims necessarily include the features of the claims from which they depend and in

addition define other features and functionality not found in those claims, it is also believed that these dependent claims are also in condition for allowance.

For the foregoing reasons, reconsideration and allowance of all claims pending in the application is respectfully requested.

Respectfully submitted,

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